

**REQUIRED STATEMENT  
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Olaf Abrahamson Case No. 23-11405 Chapter 13

All Cases: Moving Creditor AMERIHOM MORTGAGE COMPANY, LLC Date Case Filed 08/29/2023

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing 12/05/2023 or Date Plan Confirmed \_\_\_\_\_

Chapter 7: ☐ No-Asset Report Filed on \_\_\_\_\_

☐ No-Asset Report not Filed, Date of Creditors Meeting \_\_\_\_\_

1. Collateral

a. ☒ Home

b. ☐ Car Year, Make, and Model \_\_\_\_\_

c. ☐ Other (describe) \_\_\_\_\_

2. Balance Owed as of Petition Date \$ 151,609.51

Total of all other Liens against Collateral \$ \_\_\_\_\_

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$ 135,000.00

5. Default

a. ☐ Pre-Petition Default

Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_

b. ☒ Post-Petition Default

i. ☒ On direct payments to the moving creditor

Number of months 3 Amount \$ 3,603.60

ii. ☐ On payments to the Standing Chapter 13 Trustee

Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_

6. Other Allegations

a. ☒ Lack of Adequate Protection § 362(d)(1)

i. ☐ No insurance

ii. ☐ Taxes unpaid Amount \$ \_\_\_\_\_

iii. ☐ Rapidly depreciating asset

iv. ☒ Other (describe) Post-petition payments are not being made

b. ☒ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)

c. ☐ Other "Cause" § 362(d)(1)

i. ☐ Bad Faith (describe) \_\_\_\_\_

ii. ☐ Multiple Filings

iii. ☐ Other (describe) \_\_\_\_\_

d. Debtor's Statement of Intention regarding the Collateral

i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☐ No Statement of Intention Filed

Date: November 29, 2023

/s/ Samantha C. San Jose

Counsel for Movant